## INFORMATION REQUEST LETTER FOR THE SAN FERNANDO VALLEY/NORTH HOLLYWOOD SUPERFUND SITE NORTH HOLLYWOOD, CALIFORNIA

## PARKER-HANNIFIN CORPORATION RESPONSE

## **NOVEMBER 6, 2007**

Responses are numbered to correspond with the Information Request, a copy of which is attached hereto.

As used, herein, the following terms shall have the meanings provided below:

"Parker" or the "Company" shall mean Parker-Hannifin Corporation.

"Response to the 1992 104(e) Information Request" shall mean the response to the EPA's May 14, 1992 Information Request submitted by Parker dated July 2, 1992.

"Property" or "Facility" shall mean the property and improvements at 11310 Sherman Way, Sun Valley, California.

1. The individual answering the questions on behalf of Parker is:

Thomas L. Meyer Deputy General Counsel Parker-Hannifin Corporation 6035 Parkland Boulevard Cleveland, OH 44124 Telephone: 216.896.2809

Mr. Meyer has been a Parker employee for 23 years.

2. The individual within the Company familiar with the Consent Decree is:

Thomas L. Meyer Deputy General Counsel Parker-Hannifin Corporation 6035 Parkland Boulevard Cleveland, OH 44124 Telephone: 216.896.2809

3. A description of the relationship between Parker and the Property is found in #3 of the Response to the 1992 104(e) Information Request. The claims brought by Hawker Pacific, the Wagners and Mr. Basinger as the basis for Parker's involvement in the litigation were based solely on Parker's prior occupancy of the Property.

- 4. Based on available documentation, Parker has no current knowledge of the individuals who were responsible for environmental matters at the Property (which was last operated by Parker in 1982) except as mentioned in the Hazardous Waste Manual attached as Exhibit 11-1 to the Response to the 1992 104(e) Information Request.
- 5. Parker is currently an active corporation.
- 6. Parker was incorporated in Ohio on December 30, 1938.
- 7. Parker currently exists and operates as a corporation. The business structures under which Parker or its majority-owned or wholly-owned subsidiaries operated at the Property are described in #3 of the Response to the 1992 104(e) Information Request.
- 8. See #3 of the Response to the 1992 104(e) Information Request for information regarding the business structures which operated at the Property.
- 9. Attached as Exhibit 9-1 is a copy of the Company's Articles of Incorporation.
- 10. Parker did not operate under a fictitious name at the Property.
- 11. Neither Parker, nor any of its majority-owned or wholly-owned subsidiaries, owned the Property.
- 12. Neither Parker, nor any of its majority-owned or wholly-owned subsidiaries, owned the Property.
- 13. See #3 of the Response to the 1992 104(e) Information Request for dates of operation by Parker at the Property.
- 14. See #3 and #4 of the Response to the 1992 104(e) Information Request for information regarding the Property's owner. Also see Exhibits 3-9 and 3-10 to the Response to the 1992 104(e) Information Request for copies of the relevant lease agreements.
- 15. See #4 and #5 of the Response to the 1992 104(e) Information Request for information concerning prior owners and operators and the absence of evidence regarding releases of hazardous substances during such prior ownership or operation. Parker sold the operations at the Facility to Flight Accessories Services, Inc. in 1982 (see paragraph 7 of #3 of the Response to the 1992 104(e) Information Request). Based on information learned during the litigation in the 1990s, other subsequent owners or operators at the Property include Inchcape, Inc.; Zero Corporation; Electronic Solutions, Inc.; and Hawker Pacific, Inc. Parker is not aware of any release or threatened release of hazardous substances at the Property during any such period of subsequent operation or ownership
- 16. Based on available documentation, Parker has no current knowledge of the names of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Property (which was last operated by Parker in 1982) except (a) Harry Gunn (see attached Exhibit 16-1, a sworn statement of Mr. Gunn provided by Hawker Pacific to Parker in 1993; and (b) as mentioned in the Hazardous Waste Manual attached as Exhibit 11-1 to the Response to the 1992 104(e) Information Request (titles and then-current telephone numbers for such employees are included in Exhibit 11-1). Parker is not aware of any additional contact information with respect to such

individuals at this time, although a diligent search for additional potential archived materials continues.

- 17. See the leases attached as Exhibits 3-9 and 3-10 to the Response to the 1992 104(e) Information Request for information concerning the size of the Facility. Based on available documentation, Parker does not know the number of people employed at the Facility. See #2 of the Response to the 1992 104(e) Information Request for information concerning the products manufactured and the services performed by the Company at the Facility. To the best of Parker's knowledge, there was no significant change in Facility size, number of employees or the products manufactured over the period of Parker's operations at the Facility.
- 18. Chromium-related substances were used at the Facility in connection with plating of landing gears and helicopter hydraulic components. See Exhibit 11-1 of the Response to the 1992 104(e) Information Request for information on disposal practices. See also the reference to a SCAQMD permit for "Tank-chrome plating or stripping" in #18 of the Response to the 1992 104(e) Information Request. Parker has no other information or documentation regarding the utilization, volume or storage of chromium-related substances at the Facility.
- 19. See #6 of the Response to the 1992 104(e) Information Request for information concerning the location of improvements and features at the Facility. See also Exhibit 16-1 attached hereto (Declaration of Harry Gunn).
- 20. Based on available documentation, Parker is not aware of any hazardous material business plans or chemical inventory forms other than the Hazardous Waste Manual attached as Exhibit 11-1 to the Response to the 1992 104(e) Information Request. Parker does not know whether this Manual was submitted to any governmental agencies.
- 21. See #11 of the Response to the 1992 104(e) Information Request (and related Exhibit 11-1) for information concerning chemicals and hazardous substances used at the Facility. See also Exhibit 16-1 attached hereto (Declaration of Harry Gunn).
- 22. See #11 of the Response to the 1992 104(e) Information Request (and related Exhibit 11-1) for information concerning the used of the listed substances at the Facility. See also Exhibit 16-1 attached hereto (Declaration of Harry Gunn).
- 23. See #7 and #8 of the Response to the 1992 104(e) Information Request for information on the availability of environmental data or technical or analytical information regarding conditions at the Facility. See also attached Exhibit 23-1, Summary of Findings of Environmental Assessment Work dated April 6, 1993 prepared by Law/Crandall, Inc. and provided by Hawker Pacific to Parker in 1993.
- 24. Based on available documentation, Parker is not aware of any groundwater wells located at the Facility.
- 25. See #18 of the Response to the 1992 104(e) Information Request for information concerning permits held by the Facility.
- 26. See #14 of the Response to the 1992 104(e) Information Request for information concerning sewer discharges from the Facility.

- 27. See #11 of the Response to the 1992 104(e) Information Request (and related Exhibit 11-1) for information concerning waste streams generated at the Facility. See also Exhibit 16-1 attached hereto (Declaration of Harry Gunn).
- 28. See #11 of the Response to the 1992 104(e) Information Request (and related Exhibit 11-1) for information regarding pre-treatment procedures, if any, at the Facility.
- 29. See #11 of the Response to the 1992 104(e) Information Request (and related Exhibit 11-1) for information regarding sump clean-out procedures, if any, at the Facility.
- 30. See #11 of the Response to the 1992 104(e) Information Request (and related Exhibit 11-1) for information regarding waste storage procedures at the Facility. See also Exhibit 16-1 attached hereto (Declaration of Harry Gunn).
- 31. See #12 of the Response to the 1992 104(e) Information Request for information regarding releases at the Facility.
- 32. Parker does not have copies of any correspondence with governmental authorities concerning the use, handling or disposal of hazardous substances at the Facility except for Exhibit 1.1 to the Response to the 1992 104(e) Information Request (letter to EPA regarding sale of operations in 1992 requesting transfer of EPA ID No. CAT000646257)
- 33. Except for the Response to the 1992 104(e) Information Request, Parker has not submitted any other 104(e) responses with respect to its operations at the Facility.